

## Hardesty, Doug

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**From:** Baumgartner, James R (DEC) <jim.baumgartner@alaska.gov>  
**Sent:** Friday, September 27, 2013 6:38 PM  
**To:** Hardesty, Doug  
**Cc:** Nair, Pat; Baumgartner, James R (DEC); Plosay, James R (DEC)  
**Subject:** EPA PSD permit BACT limits for Sohio (now BP) Prudhoe Bay  
**Attachments:** PSD EPA X79-05 X80-09 X81-01 X81-13 modification 08291997 .PDF

Doug,

BP has recently raised concerns w/ our director regarding TV coordination and generally applicable requirements. I'd like to discuss their concerns with you and/or Pat next week. Please let me know of a convenient time/date to discuss this w/ you.

### Short Issue Statement:

Do federal BACT limits apply only at full load?

### General Background:

EPA permitted Prudhoe Bay through four permitting actions in the late 70s and early 80s. In addition, EPA has made changes to those decisions in 1997.

EPA imposed BACT limits for NO<sub>x</sub>, CO, and other pollutants dependent on the project. At other than full load, CO emissions are expected to be greater than that of full-load characteristics.

During our initial round of Operating Permits, ADEC added a footnote stating that these BACT limits apply only at full load. However, the federal decisions and amendments do not include such language.

We are completing renewal permits, and these Prudhoe Bay permits are remaining in our queue. We reconsidered our 2002/2003 decision and have decided to remove these footnotes from our renewal permit, explaining that the footnote is inconsistent w/ federal permitting decisions. Neither the Technical Reports nor EPA X PSD permits specifically restrict limits to apply only at full load. To us it would make little sense to impose an emission limit representative of BACT at only full load.

As we've discussed before, the EPA Prudhoe Bay BACT limits generally used AP-42 at the time of the permitting decision for NO<sub>x</sub> & CO. The amendments updated these limits w/ current AP-42 emission factors as BACT. We also impose gap-filling monitoring (testing) to prove whether they comply as part of the renewal permits, which may constitute part of the "rub."

Attached is a copy of the federal permit amendment from the 1997 amendment with the BACT limits

James R. Baumgartner,  
Compliance Section Manager,  
Air Permits Program  
Ph. 907-465-5108 Fax 907-465-5129

